

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVID PAHER and  
PHILENA PAHER

Plaintiffs,

v.

UICI;  
MEGA LIFE & HEALTH INSURANCE  
COMPANY;  
NATIONAL ASSOCIATION FOR THE  
SELF EMPLOYED;  
STEPHANIE TRANCHINA;  
and FICTITIOUS DEFENDANTS  
“A,” “B,” and “C,” whether singular or  
plural, are those other persons,  
corporations, firms, or other entities  
whose wrongful conduct caused or  
contributed to the cause of the injuries  
and damage to the plaintiff, all of  
whose true and correct names are  
unknown to the at this time,  
but which will be substituted by  
amendment when ascertained,

Defendants.

CIVIL ACTION NO.: 2:06cv297-DRB

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

Defendant UICI hereby moves the Court for an additional three (3) weeks to file a responsive pleading in this matter so that the deadline to file a responsive pleading would be Friday, April 28, 2006. In support of this Motion, Defendant UICI states:

1. Defendant UICI will file a motion challenging this Court’s personal jurisdiction over UICI pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure. Additional time is needed to prepare the necessary materials to support a challenge to the Court’s jurisdiction.

2. Defendant UICI also anticipates filing a motion to dismiss certain claims alleged against UICI pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Without waiving and while specifically reserving all defenses, including those under Rule 12 of the Federal Rules of Civil Procedure, UICI hereby requests this additional time to file a responsive pleading.

/s/ E. Lockett Robinson, II  
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Attorneys for Defendant The MEGA Life and  
Health Insurance Company

### **CERTIFICATE OF SERVICE**

I hereby certify that I have, April 6, 2006, served a copy of the foregoing pleading on all counsel of record by placing a copy of same in the United States Mail, properly addressed and first class postage prepaid, as follows:

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/s/ E. Lockett Robinson, II